

Wisconsin Department of Commerce PECFA Program

BID NUMBER: 03-53233-2514-02

PECFA number: 53233-2514-02
BRRTS number: 03-41-113108
Site Name: Cooper and Associates/HH West
Site Address: 2302 West Clybourn Street, Milwaukee, WI

Program contact: Linda Michalets, Site Review Hydrogeologist
Program contact address: 101 W. Pleasant St., Suite 205, Milwaukee, WI 53212
Program contact phone: 414-220-5376

Submitted Questions and Responses

1. I have a question regarding Section 4 which states: *"The Department of Natural Resources is requiring, at a minimum, limited hot spot removal and groundwater monitoring to bring this site to closure."* As stated in the Addendum to the Site Investigation Report (KEY, April 8, 1998), *"The results of the alternative SSRCL assessment for benzene, together with the SSRCL data within the SI Report (KEY, March 17, 1998), indicate that soil remedial action ("hot spot" removal) is not necessary."* The SSRCLs were approved by the WDNR as documented in a September 9, 1998 letter to Cooper & Associates, thus eliminating the need for any soil remediation. Please provide clarification why limited hot spot soil removal is being requested by the WDNR as stated in Section 4 of Bid Number: 03-53233-2514-02?

In the September 9, 1998 letter, Binyoti Amungwafor, DNR, addressed Key's development of Site Specific Soil Cleanup Levels (SSSCLs) by stating that *"the Department approves of this approach if the cleanup goals set will be attained. If such goals are not met, you will be required to cleanup the site to the requirements of the applicable standards at the time."* And further, *"we suggest you develop SSSCLs for the PAHs.."*

In a DNR letter to the owner, dated October 12, 1998, Mr. Amungwafor stated *"please summarize the interpretation of your calculated SSCLs for the protection of groundwater and any modeling results. A statement such as 'SSRCL for the protection of groundwater were calculated in accordance with NR 720' is a generalized statement. In any case where natural attenuation is proposed for a given site, there should be mention of an approximate time frame that the site will take to achieve ch. NR 140 groundwater standards. In this case, we do expect you to supply us with such information. The overall data still predicts some contaminant source removal. The Department assumes that this will be addressed in the Remedial Action Report."* The subject line of the above letter was *"Chlorinated Volatile Organic Compound Site Investigation,"* however, Mr. Amungwafor has stated that the source removal requirement is for petroleum contamination. In a written message to Linda Michalets, Mr.

Amungwafor stated that *"the scientific justification for this [soil removal] is based on the fact that some accessible petroleum contaminated soils need some possible hot spot removal in the area of the UST and a location on the northwest of the UST in the parking lot. The groundwater analytical results at MW-1 agrees with the justification of why the limited source removal."* As the DNR has more intimate knowledge of this site (meetings with owner, consultant, etc.) and is the regulatory authority for site closure, Commerce is not questioning this requirement.

- 2. Are the two 1,500 gal existing USTs as depicted on the figures currently operating? What were the locations of the former USTs?**

According to the Storage Tank Database, one 1,000-gallon and one 1,500-gallon leaded gasoline underground storage tanks were removed from the site on May 29, 1998, not two 1,500-gallon USTs as was reported by Key Engineering Group. The former UST locations (as 1,500-gallon USTs) are indicated on site figures. Commerce has no information on file stating that the indicated locations are incorrect. Commerce does not have copies of the tank closure report(s).

- 3. What is the zoning of the property?**

This site is currently used for commercial purposes. No zoning information was provided to the Department.

- 4. Should the monitoring wells in which to show contaminant mass reduction be MW-1 and MW-3, rather than MW-3 and MW-9?**

The Department selected monitoring wells MW-3 and MW-9, to provide evidence that remediation is successful (stable or shrinking groundwater plume). The Department anticipates that the PECFA funding cap will be sufficient for remediation of this site (\$500,000 for underground non-marketer). Therefore, calculation of the mass reduction at this site should not be necessary to achieve closed remedial action status.